#### IN THE UNITED STATES DISTRICT COURT

### FOR THE EASTERN DISTRICT OF VIRGINIA

### Alexandria Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. 1:11CR115
v.	)	T I I I I C C I
JORGE TORREZ,	)	The Honorable Liam O'Grady
Defendant.	)	

## **MOTION FOR DISCLOSURE**

COMES NOW the United States of America, by and through its attorneys, Neil H.

MacBride, United States Attorney for the Eastern District of Virginia, and Michael E. Rich,

Jonathan L. Fahey and James L. Trump, Assistant United States Attorneys and moves this court

for permission to disclose sealed materials to the defense in order to comply with our discovery

obligations. These materials will be disclosed subject to the protective order already in place.

The defendant does not object to this motion.

WHEREFORE the government moves this Court for permission to disclose any sealed materials as they relate to the government's discovery obligations.

Respectfully submitted,

Neil H. MacBride United States Attorney

By: /s/
Michael E. Rich
Jonathan L. Fahey
James L. Trump
Assistant United States Attorneys

# Certificate of Service

I certify that on this 5th day of June, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Geremy C. Kamens, Esq. Federal Public Defender's Office 1650 King Street, Suite 500 Alexandria, Virginia 22314

Christopher M. Davis 1350 Connecticut Avenue, N.W., Suite 202 Washington, D.C. 20036

By: /s/
Jonathan L. Fahey
Assistant United States Attorney